

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

In re:)	Case No. 24-80617
)	(Chapter 11)
C M HEAVY MACHINERY, LLC)	
)	
Debtor.)	
)	

**CONSENT MOTION TO CONTINUE MOTION TO EXTEND EXCLUSIVITY
HEARING**

Comes now C M Heavy Machinery, LLC (“CMHM” or the “Debtor”), by and through undersigned proposed counsel, pursuant to Local Rule 9006-1, and moves this Honorable Court to continue the motion to extend exclusivity hearing set in the above-captioned matter for March 12, 2025, to March 19, 2025, and in support thereof notes as follows:

CMHM seeks a continuance of the hearing on the Motion to Extend Exclusivity Period, originally set for March 12, 2025, and requests that it is rescheduled to March 19, 2025. This request is made to promote efficiency and judicial economy, as CMHM has a related evidentiary hearing on Great Plains National Bank’s Motion to Dismiss or Convert already scheduled for March 19, 2025. Holding both hearings on the same date will eliminate unnecessary travel for counsel and other involved parties, reduce costs, and facilitate a more efficient and comprehensive resolution of the issues before the Court. All parties have been contacted and have consented to this continuance.

WHEREFORE, C M Heavy Machinery, LLC respectfully prays this Honorable Court (i) continue the hearing on the Motion; and (ii) afford such other and further relief as may be just and proper.

[Signature on the Following Page]

Respectfully Submitted,

Dated: March 10, 2025

By: /s/ Christianna A. Cathcart
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of March, 2025, a copy of the foregoing was served electronically upon filing via the ECF system.

/s/ Christianna A. Cathcart
Christianna A. Cathcart, Esq.